



*Ag cur chun cinn ár Réigiún
Promoting our Region*

**Sean McKeown,
Director of Services,
Forward Planning Section,
Kilkenny County Council,
County Hall,
Kilkenny.**

15th June, 2018

Re: Section 27A (1) Observations on the Pre-Draft Issues Paper for public consultation on the Review of the existing Kilkenny County Development Plan 2014 – 2020 and Kilkenny City & Environs Development Plan 2014 – 2020 and the preparation of the new consolidated County Development Plan for the period 2020 – 2026.

A Chara,

I refer to the notice dated 19th April, 2018 inviting pre-draft submissions to the Review of the existing Kilkenny County Development Plan 2014 – 2020 and Kilkenny City & Environs Development Plan 2014 – 2020 and the preparation of the new consolidated County Development Plan for the period 2020 – 2026 for areas previously covered by the City and Environs Development Plan and County Development Plan.

The Regional Assembly welcome the publication of the *Pre-Draft Issues Paper* and notes the extensive range of topics addressed in the paper and the County Council's commitment to the public consultation process.

Having regard to section 11(2) and section 27A(1) of the Planning and Development Act 2000, as amended, the Regional Assembly wishes to make the following observations on matters for consideration in the course of the review of the Kilkenny Development Plans and preparation of a new Kilkenny County Development Plan 2020-2026 (to be referred to as the 'Draft plan' in the Observations below)

1. Statutory Obligations

- 1.1 The Draft Plan should be consistent with the *Regional Planning Guidelines for the South-East 2010-2022* (RPGs), as far as is practicable, and its successor, the *Regional Spatial and Economic Strategy* (RSES) for the Southern Region, which is due to be made in Quarter 1, 2019.
- 1.2 The Planning Authority should demonstrate that the Draft Plan is fully compliant with the requirements of all relevant Section 28 Guidelines.

2. Core Strategy, Population and Demographics

- 2.1 The Draft Plan should be consistent with the population targets for the region. In this regard, it is anticipated that new guidance on population targets will be issued by the Department of Housing, Planning, Community and Local Government in June 2018 and will subsequently be incorporated into the RSES.
- 2.2 The Core Strategy should be evidence-based and set out a clear Settlement Strategy and Settlement Hierarchy which is consistent with the Regional Settlement Strategy and population targets to be contained within the RSES. The National Planning Framework (NPF) has identified Compact Growth of urban centres as a key principle for the future sustainable development of urban areas and settlements under National Strategic Outcome 1 (NSO). The Draft Plan should incorporate policy objectives relating to compact growth such as infill development, improved liveability and greater use of derelict or underused land and buildings as part of a wider urban regeneration strategy to underpin the Core strategy and Settlement Strategy to be formulated in the Draft Plan. Funding through the Urban Regeneration and Development Fund and the Rural Regeneration and Development Funds will provide opportunities for finance in support of Compact Growth, work in which it acknowledged Kilkenny County Council is already engaged through its urban regeneration work in the City.
- 2.3 In relation to the Ferrybank Area, the NPF indicates that this area will comprise part of the Waterford Metropolitan Area (boundary of MASP yet to be confirmed by the Department), for which a Metropolitan Area Strategic Plan (MASP) will be prepared 'in tandem with and as part of' the RSES. The Issues Paper states at Section 3 that *'the Ferrybank area has the potential to deliver sustainable growth in the context of the targets set for Waterford City in the NPF'*. In this regard, the Regional Assembly will seek to work closely with the local authority in identification of strategic housing and employment locations and infrastructure priorities for the area as part of preparation of the Waterford MASP. This will in turn provide key objectives for inclusion in the Draft Kilkenny County Development Plan.
- 2.4 In developing a Core Strategy, there should be careful consideration by the County Council of the implications of population targets for achieving the best distribution of residential development, employment and other development and services within the plan area. It should be clearly demonstrated that the identification of proposed zoned lands for residential, industrial and other forms of development has been subject to sequential testing and the assessment of whether these lands are ultimately serviceable. Recognition of constraints such as physical and social infrastructure would also provide evidence of which lands should be justified as providing the most sustainable location for development lands.
- 2.5 There should be clear alignment of the housing, settlement, economic and retail objectives of the Draft Plan and its Core Strategy with the Regional Planning Guidelines, as far as is practicable and its successor, the RSES. The Draft Plan should also seek to prepare and incorporate a Joint Retail Strategy with Waterford City and County Council in accordance with the Retail Planning Guidelines and any additional requirements of the RSES and Waterford MASP.

3. Housing Provision and Sustainable Communities

- 3.1 The Regional Assembly notes the focus on Housing and the 'current housing crisis' contained in the Issues Paper and the Draft plan should include objectives aimed at increasing the supply of more homes at the right locations in support of the Government *Action Plan for Housing 'Rebuilding Ireland'*
- 3.2 The Regional Assembly welcomes the focus in 'Questions to consider' in Sections 1 and 2 on social inclusion and would support development of objectives in the Draft Plan to address demographic change such as the housing requirements of older people and those with particular housing needs such as people with disabilities, students and travellers, together with the provision of wider public services to support communities.
- 3.3 The Draft Plan should address the provision of the physical, economic, health and social infrastructure in the plan area in a manner which promotes a high quality of life for all.

4. Transportation and Infrastructure

- 4.1 The Draft Plan should promote an integrated approach to planning for land-use and transportation, particularly for large scale development sites involving the promotion of sustainable transportation / smarter travel policies where such development potential is identified. There should be consideration as to the best use of land having regard to the location, scale and density of new development and its potential to benefit from and support public transport and infrastructure services. In this regard, it is noted that the Issues Paper highlights these issues including the retention and use of existing infrastructure including the rail network. The Draft Plan should, therefore, contain objectives for sustainable transportation which are consistent with the RPGs, as far as is practicable, and the Regional Transport Strategy to be contained in the RSES.
- 4.2 The Regional Assembly notes Section 9 of the Issues Paper, which highlights the important role of supporting infrastructure for the sustainable development of the County including water services, broadband, energy, road and rail.

5. Economic Development and Employment

- 5.1 The Regional Assembly supports the development of policies and objectives to support the diverse economic base in the County and the focus on the Local Authority's enhanced economic development role through the LECP and work of LEO. The RSES will provide additional support and guidance through the economic elements to be contained in the RSES and regional economic policies will provide a supportive framework for the future economic development of the County and should be included in the Draft Plan.
- 5.2 The Port of Waterford at Belview is considered to be a key strategic asset for the Southern Region, providing international connectivity which is well-connected to road and rail networks. The Draft Plan should incorporate relevant policies in the RSES and MASP in relation to the role of Port and wider Belview Industrial Area, which will support implementation of NSO 4 for High Quality International Connectivity.
- 5.3 The presence of the two Institutes of Technology in the South-East offers important opportunities for economic development in the County and the potential for expansion of Research, Development and Innovation(RDI) activity and linkages to Industry. This potential

is recognised in the Issues Paper and, with the planned development of a multi-campus Technological University for the South-East, the Draft Plan should seek to incorporate objectives for development of the Higher Educational Institutes in the South-East as key regional drivers.

5.4 The National Planning Framework sets out a strong focus on Urban Regeneration in NSO1 – Compact Growth and the RSES will support initiatives which promote sustainable compact development including infill development in the City, District Towns and smaller settlements. In this regard the focus on development of the Abbey Quarter for mixed employment and residential use in Kilkenny highlighted in the Issues Paper and other locations identified to support economic development through successful place making are welcomed.

5.5 As indicated in the Issues Paper, the Draft Plan should include objectives to support and facilitate economic development through increased tourism. In this regard, *Ireland's Ancient East* and other projects such as the Medieval Mile and development of Greenways offer the potential to support Failte Ireland initiatives and wider regional objectives to be identified in the RSES.

6.0 Rural Development.

In terms of rural development, the Draft Plan should incorporate objectives for rural development which are consistent with the RSES and the NPF focus on 'Strengthening Rural Economies and Communities' (NSO 4) and seek to advance implementation of Actions from '*Realising our Rural Potential - the Action Plan for Rural Development*'.

7.0 Climate Change and Renewable Energy

7.1 The significant challenges posed by climate change are addressed in the Issues Paper where the climate change is identified as a cross-cutting issue. The Draft Plan should include policies which are consistent with RSES policy relating to climate action and which support wider Government Strategy as set out in the *National Mitigation Plan* and *National Adaptation Framework*.

7.2 The Draft Plan should include objectives to support the implementation of the *National Renewable Energy Action Plan* for Ireland

8.0 Environmental Protection

8.1 The Planning Authority should ensure that the proposed Draft Plan is fully compliant with the requirements of the RPGs/RSES in relation to environmental management and relevant Guidance from the Department in relation to Flood Risk Assessment, Strategic Environmental Assessment, Appropriate Assessment, the Water Framework Directive and all relevant EU Directives.

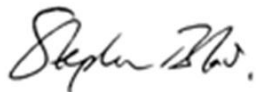
8.2 The Draft Plan should include objectives for the protection of the environment including natural and built heritage, archaeology, green infrastructure and the landscape, such that clear guidance can be provided in the plan in relation to suitable locations for renewable energy projects and rural economic development such as forestry and mineral extraction.

9.0 Cross Cutting Issues

The Regional Assembly welcomes the setting out of potential cross cutting issue which can be applied across all sections in the course of preparing the Draft Plan. A similar approach is envisaged in the preparation of the RSES and the development of cross cutting themes relating to regional policy could inform the development of this approach to be applied to the County Development Plan. The thematic approach to the Development plan should also reflect the focus of National Strategic Outcomes (NSOs) in the NPF and the regional implementation of wider the NPF policy framework in the forthcoming RSES.

The Regional Assembly look forward to ongoing collaboration with the County Council in the preparation of the new Kilkenny County Development Plan 2020 - 2026. Should you wish to discuss any of the above Observations, please contact Dominic Walsh, Regional Planning Officer, on 087 296 2561 or email: dwalsh@southernassembly.ie.

Mise le meas

A handwritten signature in black ink, appearing to read 'Stephen Blair'.

Stephen Blair, Director.